

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,)
)
 Plaintiff,)

)
vs.)Case No. 09-3018-CV-S-RED
)
TEXAS COUNTY, MISSOURI; MICHAEL)
R. ANDERSON, TEXAS COUNTY)
PROSECUTING ATTORNEY; and)
MICHAEL R. ANDERSON,)
Individually,)
)May 25, 2010
 Defendants.)Houston, Missouri

VIDEOTAPED DEPOSITION OF CHRISTINA NORMA ROSE MOSLEY

a Witness, produced, sworn and examined on the 25th day of

May, 2010, between the hours of 8 a.m. and 5 p.m. of that

day, at Texas County Justice Center, 519 North Grand, City

of Houston, County of Texas, before

JOANN RENEE RICHARDSON, CCR
Certified Court Reporter
20051 State Route B
St. James, Missouri 65559

in the above-entitled cause, pursuant to Amended Notice to

Take Video Deposition, on the part of the Plaintiff.

Page 202

Page 204

1 this -- like, "Are you there? I need to talk to you
2 about this stuff that's going on. Let me in, I just
3 want to talk," basically, was about it. It didn't
4 sound threatening to me, what part I heard. But it
5 was only a very small part, so. And I really
6 couldn't tell you if it was the beginning of the
7 tape.
8 Q. Did Monica tell you it was threatening?
9 A. Monica said to me that Millie was scared,
10 because Millie was there with her.
11 Q. Did Millie say anything to you?
12 A. No.
13 Q. 4-B says: Conspired with each other to
14 disseminate false information that Plaintiff, Michael
15 R. Anderson, made comments of a sexual nature during
16 a series of telephone calls made to the home of
17 Defendant, Monica Daniel, on or about December 18,
18 2005. Do you see where it says that?
19 A. Yes.
20 Q. Do you have any information that that is
21 true?
22 A. Okay, Monica had said that she got him.
23 "I've got him on tape."
24 Q. When did she tell you that?
25 A. That was after the night he went over

1 prosecutor, but for another group, and he was real
2 drunk. It was like Mike, Monica -- actually, I'm not
3 sure if I was sitting right beside Mike. I think I
4 was. I think Stephanie was like -- I was here,
5 Mike's here, Stephanie, and then Monica.
6 Anyway, the guy come to the table, off the
7 dance floor, introducing himself to us, and about
8 fell on top of, actually, me. I was sitting there,
9 staggering over top. And I was like, "Oh, my God,"
10 you know, attitude.
11 Mike got up and shook his hand and I don't
12 know if Mike actually said something to him like,
13 "You need to have a seat," but basically the guy was
14 drunk. Monica jumps up, storms off and I go
15 following her. I said, "What is wrong?"
16 And she tells -- as Mike is coming up
17 behind us, she's saying, "I'm not with you. You're
18 not my boyfriend. Don't basically tell anybody that
19 they can't come over here." Which I don't think he
20 done that, at all. I don't remember him saying
21 anything about, "You have to leave."
22 It was just basically the guy was drunk and
23 falling down on top of -- practically on top of us.
24 Mike said, "I'm not saying that I'm your boyfriend."
25 The guy is drunk. He's about to fall on top of all

Page 203

Page 205

1 there. She indicated that Millie was there. I said,
2 "Now, you know Mike, he's never been a threatening
3 person. How is that helping you?" And she said,
4 "Because it will." Now, what it will, I don't know.
5 She never did tell me. As you could hear on the
6 phone conversations, she's pretty vague.
7 Q. Well, my question, though, what it says,
8 "They conspired to disseminate false information that
9 Anderson made comments of a sexual nature." Did she
10 say anything other than what you just said to me?
11 A. Not that I recall.
12 Q. C says: Conspired with each other to
13 disseminate false information that Plaintiff, Michael
14 R. Anderson, engaged in inappropriate behavior during
15 a prosecutor's training seminar in September of 2005.
16 What do you know about that?
17 A. I was there. I was there the whole time.
18 Q. Okay. What happened?
19 A. Her allegation here is, we was sitting in
20 the bar part of the hotel. There was me, Monica,
21 Mike, Stephanie. There was a guy that was pretty
22 well intoxicated. Monica and --
23 Q. Do you know his name?
24 A. No, didn't know him. He was from another
25 training part there for training, as well. Not for

1 of youn's, you know. He's being disrespectful."
2 That was his, you know, kind of like statement to
3 her.
4 And she still was screaming at him about
5 this -- him not being her boyfriend, okay? He says,
6 "I never said I was your boyfriend. I'm not your
7 boyfriend. I don't know why you keep saying that."
8 Then he slung his cup of -- whatever was in it -- on
9 the ground and he went his way and I followed Monica
10 to the room, and so did Stephanie.
11 And I went up there and I asked her, "What
12 in the world are you talking about? Why did you say
13 that was your boyfriend?" And she said, "Well,
14 that's what's he's acting like." I said, "Monica, he
15 didn't do anything to you. I felt like he was
16 protecting us." I told Stephanie that, too.
17 We had like adjoining rooms, so it was like
18 a door in between our two rooms, and there was me and
19 Stephanie and Monica, so it was us three girls in one
20 room -- or two rooms, actually, that joined. Anyway,
21 we just kind of talked about it. There was -- my
22 personal opinion, he didn't do anything wrong. That
23 was not -- he didn't say anything sexual to Monica.
24 The guy was drunk. The guy was
25 belligerent, and he come over there and made a scene.